

Exhibit 6



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July 20, 2022

Via Email and Regular Mail

Tadd J.P. Bogan, Esq.
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3800 First Place Tower
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Re: Undisclosed Armory Emails
Case No.: 20-cv-0341-CVE-SH
Our File No. 16075-1

Dear Tadd,

We were just apprised that your client withheld relevant documents in discovery. We wanted to notify you of this as soon as we discovered it.

Yesterday, KE Arms, LLC (“KEA”) was contacted by Kenneth King (“King”) on Facebook. *See* Facebook messages set forth in **Exhibit 1**. King asked for photos of the inside of the KP-15 before assembly. *Id.* As an example of what he was looking for, King sent KEA a photo as an example, which was a photo of the GWACS Armory LLC (“Armory”) MKII sent to him by Armory in 2018. *Id.*

King sent KEA his original email communication with Armory which are attached hereto as **Exhibits 2 and 3**. As shown in first email, King requested an internal photo of the MKII lower receiver from Armory on May 14, 2018. **Exhibit 2**. On the same day, Armory sent King a photo of the MKII. *Id.* Notably, the photo disclosed the following details pertaining to the MKII:

- Internal rib structures and dimensions of the MKII with a ruler showing dimensional authentication;
- The design and location of the mold runner (i.e., where the molten plastic flows into the mold); the mold gate location and angle;
- The worn state of the mold exhibited by the flashing occurring in the finished product;

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- The location of the mold ejector pints as shown by the rounded circles on the inside of the plastic product; and
- Other details pertaining to the MKII. *Id.*

Then, in a subsequent email, King told Amory the following:

That is absolutely what I was looking for. Thank you very much! Have you guys thought about making a second generation lower? I know InRange's What Would Stoner Do project has really pushed the popularity of your receivers.. While they're pretty good as is there are definitely some small things I would change. The biggest one being the grip reach to the safety and magazine release. I know it was made like that to give more support to the stock meeting area at the back of the FCG cavity but you could push the grip forward a bit if you made that whole area just wider/thicker out to the sides. You could even incorporate this modification into having QD socket or other sling mounting points. Thanks again!
– Kenneth [See **Exhibit 3**]

Remarkably, Amory responded to King as follows: “We are and **I have passed this on to our engineer for consideration!**” *Id.* (emphasis added).

As you know, Amory did not disclose these emails in discovery. Please advise (1) why Amory failed to disclose this email, and (2) whether there are additional emails like these pertaining to the CAV-15 that have been withheld by Amory.

Sincerely,

MARQUIS AURBACH

/s/ Alexander Calaway

Alexander K. Calaway, Esq.

AKC/ch

Enclosures as described.
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